

Exhibit A

1 ROUGH TRANSCRIPT - PETER COATS

2 Prakhin involving the allegation that you
3 were asked unethically and illegally to
4 change SAGA records concerning Yelena
5 Ruderman?

6 MR. BARTELS: Objection to form.

7 You can answer.

8 A. Ruderman and other attorneys

9 Q. When did you first retain
10 counsel to represent you in that lawsuit?

11 A. I believe June or July of 2022.

12 Q. What was the name of the
13 attorney that you retained?

14 A. Paul Bartels.

15 Q. How were you referred to
16 Mr. Bartels?

17 A. I had a conversation with
18 Innessa the attorney for Faruqi & Faruqi.

19 MR. BARTELS: Just hold on. I
20 want to be clear that my understanding
21 is that at some point in time
22 Mr. Coates did have a consultation
23 with Faruqi regarding potential
24 representation and those
25 conversations would be covered by

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2 MR. BARTELS: Peter again we're
3 going to attorney/client privilege you
4 can talk about who you met with where
5 you met with them but you shouldn't.
6 I don't think Mr. DiIorenzo is asking
7 for that either.

8 MR. DILORENZO: Well I'm not
9 talk is --

10 Q. Is that the first time you met
11 with the firm?

12 A. I only met with the firm spoke
13 with the firm once on the phone and once
14 in person.

15 Q. When was it that the decision
16 was made that they weren't going to
17 represent you when the consultation was
18 over was it between the two meetings?

19 A. About two weeks after the
20 meeting in the office.

21 Q. Was that the first meeting?

22 A. The first meeting -- when you
23 say meeting I'm assuming you mean
24 discussion first discussion meeting was
25 with Innessa on the phone. Second

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2 saw the word Ruderman I immediately
3 thought I know who that is, I took over
4 several of her cases, and then I looked
5 and I saw that Ruderman was suing Prakhin
6 for discrimination and it was for
7 discrimination and for problems, the same
8 problems I was having.

9 Q. You didn't have any
10 disabilities, did you?

11 MR. BARTELS: Objection to form.

12 A. No I don't have any
13 disabilities.

14 Q. Do you know anybody in the
15 office any employees in the office.
16 Attorneys, paralegals or staff that had
17 disabilities while you were there?

18 MR. BARTELS: Objection to form.

19 You can answer.

20 A. I don't know of any
21 disabilities of other people.

22 Q. Paragraph 24, shortly after
23 witnessing IT Solutions delete the SAGA
24 entries, that's your reference to the
25 Sasha that night?

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2 A. What do you mean by that night?

3 Q. Is there are there any other
4 times that you saw IT solutions allegedly
5 delete SAGA entries other than the night
6 you sat next to Sash on August 30th?

7 A. They came in on other nights
8 and got on my machine and I don't know
9 what they were doing but I know that they
10 did things and things were moved into a
11 folder called "Ben."

12 Q. Other than moving things into a
13 folder called "Ben" do you know what they
14 did?

15 A. What do you mean?

16 Q. You said they came on other
17 nights.

18 How many other nights did they
19 come in?

20 A. Many many other nights.

21 Q. Go ahead?

22 A. Which paragraph? I don't know
23 what you mean.

24 Q. Paragraph 24. It was your
25 testimony not a paragraph. You said that

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2 -- when you refer to notes I assume you
3 mean the ten or 11 notebooks?

4 A. Yes.

5 Q. Is there any other notes -- is
6 there any other documents including in
7 your term notes?

8 A. Oh, well in notes, no but
9 documentation.

10 Q. I asked you about documents?

11 A. Go ahead.

12 Q. So there's no other notes --
13 you referenced the notes as the
14 notebooks?

15 A. The notebooks are the notes.

16 Q. Go ahead?

17 A. And then I kept another
18 notebook of settlements.

19 Q. That's in addition to the ten
20 or 11 that were the daily record?

21 A. Yes. And then I kept a
22 notebook of how to operate the logins the
23 passwords the names of people, their
24 phone numbers, I called that one
25 operations on the front of every yellow

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2 pad -- on the front of every spiral
3 notebook I wrote what's inside the
4 notebook.

5 Q. And paragraph 75 also mentions
6 other documentation what do you have in
7 the way of other documentation?

8 A. Those are the assignment sheets
9 that you would get at 4:45 from Raskin.

10 Q. Do you have all of those or
11 most of those?

12 A. I think I have most of them.

13 Q. For all ten months, 8 or 9 or
14 ten months?

15 A. Yes I think so.

16 Q. Why did you keep those?

17 A. I always thought you were
18 supposed to. If it's something you were
19 assigned it's something you should keep
20 track of what you were assigned on that
21 day. It's easier than throwing it away.

22 Q. Did you have the documentation
23 -- is there anything else included in the
24 documentation besides the case
25 assignments at four o'clock?

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2 with them about the notebook other than
3 the time that you were consulting with
4 them?

5 A. Well, what do you mean when I
6 was consulting with them?

7 Q. When did you give them the
8 notebooks?

9 A. In the initial visit that I
10 made to their office. I made one visit
11 to their office near Grand Central
12 Station.

13 Q. And you brought all the
14 notebooks with you?

15 A. Yes.

16 Q. How long did you leave them
17 there before they were returned to you?

18 A. They were returned maybe in
19 seven days.

20 Q. Since then they've been in your
21 apartment?

22 A. Yes.

23 Q. Have you given them to your
24 current attorney?

25 MR. BARTELS: Objection. Again

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2 we're engaging in discovery.

3 MR. DILORENZO: That's what this
4 deposition is called. It's exactly
5 right. We'll stipulate we're engaging
6 in discovery.

7 MR. BARTELS: Are you
8 representing the law firm in
9 Mr. Coates' case? I just want to
10 clarify that for the record.

11 MR. DILORENZO: You know that,
12 don't you.

13 MR. BARTELS: Are you
14 representing --

15 MR. DILORENZO: I'm not
16 representing him. Which case are you
17 representing him, the Ruderman case or
18 his case?

19 MR. BARTELS: I'm representing
20 him in his case.

21 MR. DILORENZO: Okay. So you
22 did get discovery demands concerning
23 those notebooks back in December,
24 correct?

25